ALLENTOWN STEEL FABRICATING CO. 107/G/NA/ Tel. 284-2815

September 2, 1988

Mr. Gregg Crystall, Chief United States Environmental Protection Agency 841 Chestnut Building Philadelphia, PA 19107

Ref: Novak Sanitary Landfill Site 3HW12

Dear Mr. Crystall,

With reference to Navak Sanitary Landfill 3HW12, we are responding again to your 5 questions.

- 1 We are a custom job shop fabricator, who specializes in short run fabricated metal products for the Aggregate and Cement Industry. A detailed description of all processes would be endless because we do not have a product line. All jobs which come through are different and require different methods of fabrication. The methods of fabrication are standard, such as burning steel, welding, fitting, cleaning, grinding and prime painting.
- 2 Since 1956 from 7:30 AM to 4:00 PM, normal hours.
- 3 The only processes generating waste are the receiving of crated material for fabrication which can come on skids or in cardboard cartons, which are broken apart and discarded, and the prime painting process in which 5 gallon cans of Red Oxide primer are used to apply a 6 month protective coating to the fabricated metal products.
- 4 The volume of waste sent to Novak was 1 (one) small dumpster (36" wide x 36" High x 72" long) usually half full of office generated waste plus cardboard cartons from parts received. The volume of potentially hazardous substances was the empty paint cans which might have numbered between 10 & 15 cans per year, at the most.

continued

ORIGINAL (Red) September 2, 1988

Mr. Gregg Crystall, Chief USEPA

5 - The method of cleaning the cans is a simple one. When the painter finishes a can, he simply adds paint thinner to the empty can to remove any excess. The mixture of thinner and excess paint was then added to the new 5 gal. can to thin out the paint for our airless sprayer, a simple but effective method. The minute amount if remaining paint was about 4mm thick, at most. The empty can was then allowed to air dry, then discarded without the lid on.

Hopefully, this information will satisfy your needs concerning the Novak Landfill case. If you have any further questions, please contact me at 215-264-2815.

Please note the MSDS for the primer are again enclosed.

Sincerely,

John D. Svoboda

Vice President, General Manager

Enclosure

JDS/maf



TECHNICAL DATA SHEET OF

ORIGINAL (Red)

CHEMICAL COATINGS DIVISION

WASHINGTON ST., CONSHOHOCKEN, PA. 19428 TELEPHONE AREA CODE (1-215) 825-1903 DEVELOPED FOR: _____ ADDRESS: __ ____copies to:__ ATTENTION: __ ___ CODE NO.: _8401 PRODUCT: Red Oxide Primer TYPE APPLICATION: Brush or Spray APPLICATION RECOMMENDATIONS CONSTANTS Xylol, Mineral Spirits Wt./Gal. 11.03 ± 0.1 Lbs. Reducer VM&P Naphtha dial (Recommended Coating Viscosity <u>As desired</u> Viscosity 70 ± 5KU at 77° F. Drying Schedule Air dry - 30 minutes Solids by Wt. 60.25 ± 0.5% Solids by Vol. $34.85 \pm 0.5\%$ Dry trouch; overnight recoat PROPERTIES OF COATING Gloss Flat Hardness_ Flexibility ___ Color Red Special ___ Exposure: Interior [8] Exterior [7] Remarks: Theoretical Coverage @ 1 mil dry film - 574 sq. ft./gal. This material will not cause cracking of top coats. NOTE: Provides 6 months to one year of protection of steel prior to field painting or enclosure.

20451R

Red Oxide Primer is compatible with conventional fireproofing.